

**Amendments to the Drawings:**

The attached sheets of drawings include changes to Figures 1-2. These sheets, which include Figs. 1-2, replace the original sheets including Figs. 1-2.

Attachment: Replacement Sheets

### REMARKS

This amendment is being filed in response to the Office Action having a mailing date of September 25, 2007. Various claims and the drawings are amended as shown. New claims 14-17 are added. No new matter has been added. With this amendment, claims 1-17 are pending in the application.

#### I. Drawings

The present Office Action requested that --Prior Art-- labels be added to Figures 1-2. Accordingly, replacement sheets of drawings having amendments to Figure 1-2 are being submitted along with this amendment. It is kindly requested that these replacement sheets replace Figures 1-2 that are currently on file.

#### II. Discussion of the claims and cited references

The Office Action rejected claims 1, 6-9, and 12 under 35 U.S.C. § 102(b) as being anticipated by Fatemi (article entitled "Fractal Engine: An Affine Video Processor Core for Multimedia Applications"). The Office Action rejected claims 2-5, 10-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over Fatemi in view of Tsukasa Ooishi (U.S. Patent No. 6,714,451). For the reasons set forth below, these rejections are traversed.

##### A. Tsukasa Ooishi does not qualify as prior art

Claims 2-5, 10-11, and 13, of which claims 3 and 5 are independent claims, stand rejected on the basis of Fatemi and Tsukasa Ooishi. However, Tsukasa Ooishi does not qualify as prior art, thereby making claims 2-5, 10-11, and 13 allowable.

Specifically, Tsukasa Ooishi has a United States filing date of **May 16, 2002**. In comparison, the present U.S. national stage application claims priority all the way back to French Application No. 01/17035 filed on **December 28, 2001** (which precedes Tsukasa Ooishi's filing date of May 16, 2002), with PCT Application No. PCT/FR02/04579 designating the United States being filed on December 27, 2002 claiming priority back to said French Application No. 01/17035.

It is noted that Tsukasa Ooishi claims priority back to a Japanese application filed on November 26, 2001. However, it is well-established in U.S. patent law that this Japanese filing date of Tsukasa Ooishi is not relevant to establish a prior art date. Accordingly since Tsukasa Ooishi has a United States filing date that is subsequent to the present application's earliest priority date, Tsukasa Ooishi does not qualify as prior art.

Enclosed herewith is an English-language translation of French Application No. 01/17035, along with a certification that the translation is true and accurate. A copy of the French-language French Application No. 01/17035 was previously filed with the U.S. Patent Office on June 28, 2004, and is available in the file wrapper of the present application. Moreover, an English-language translation of PCT Application No. PCT/FR02/04579 was previously filed with the U.S. Patent Office on April 28, 2005, and is also available in the file wrapper of the present application along with the French-language copy of PCT Application No. PCT/FR02/04579 that was previously filed on June 28, 2004.

In view of these filings, the present application's claim to foreign priority has been perfected in a manner required to disqualify or otherwise remove Tsukasa Ooishi as prior art.

Accordingly, claims 2-5, 10-11, and 13 are allowable. New dependent claims 14-17 correspondingly depend upon allowable claims 3 and 5, and are thus allowable as well.

B. Discussion of independent claims 1 and 6

Independent claim 1 as amended herein recites, *inter alia*, "only four memory areas of identical sizes in which are respectively stored an identity, and three first isometries." Independent claim 6 as amended herein recites, *inter alia*, "respectively storing said values representative of the reference block and said values, which are representative of three of the isometries, in only four memory areas." It is respectfully submitted that these limitations are not met by Fatemi.

Specifically, Fatemi discloses a fractal engine in which a chain of combinations of isometric transforms is used to simplify the computation (*see* page 898, column 1 of Fatemi). The present Office Action has cited the random access memory (RAM) shown in Figure 13 of

Fatemi, which Fatemi describes as “This module stores input data, intermediate results, and output data” in column 2 of page 899, as meeting the limitations of previous claim 1 that recited “four memory areas of identical sizes in which are respectively stored an identity, and three first isometries.”

However, it is noted herein that the memory map configuration disclosed by Fatemi in his Section V-B (on page 899, column 2, to page 900, column 2) does not refer to memory areas of identical sizes respectively storing the identity and the three isometries as claimed claim 1. In particular, when Fatemi refers to storing means and variance values forming intermediate results, he does not store just three isometries as in claim 1. Moreover, Fatemi is completely silent as to the number and sizes of the memory areas in his RAM, or more specifically, four identically sized memory areas such as recited in claim 1.

Accordingly, claim 1 in its previously presented form is believed to be allowable over Fatemi. However, to facilitate prosecution and to make claim 1 further distinctive over Fatemi, claim 1 is nevertheless amended herein to explicitly recite --only four memory areas--, so as to clarify that a separate memory area (4 total) is respectively provided for the identity and three isometries. Clearly Fatemi does not meet this further limitation of claim 1.

Hence, claim 1 is further allowable over Fatemi.

Claim 6 is also amended to recite --only four memory areas--, and is thus also allowable over Fatemi.

#### C. Other claim amendments

Various amendments are made to the claims as shown to provide proper antecedent basis, to provide consistent terminology within and between the claims, to more precisely recite the subject matter contained therein, to make changes of a grammatical/typographical nature, and/or to otherwise place such claims in better form.

### III. Conclusion

Overall, none of the references singly or in any motivated combination disclose, teach, or suggest what is recited in the independent claims. Thus, given the above amendments

and accompanying remarks, the independent claims are in condition for allowance. The dependent claims that depend directly or indirectly on these independent claims are likewise allowable based on at least the same reasons and based on the recitations contained in each dependent claim.

If the attorney of record (Dennis M. de Guzman) has overlooked a teaching in any of the cited references that is relevant to the allowability of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact Mr. de Guzman at (206) 622-4900.

The Director is authorized to charge any additional fees due by way of this Amendment, or credit any overpayment, to our Deposit Account No. 19-1090.

All of the claims remaining in the application are believed to be allowable. Favorable consideration and a Notice of Allowance are earnestly solicited.

Respectfully submitted,  
SEED Intellectual Property Law Group PLLC

/Dennis M. de Guzman/  
Dennis M. de Guzman  
Registration No. 41,702

DMD:wt

Enclosures:

2 Sheets of Replacement Drawings (Figures 1-2)  
English Translation of French App. No. 01/17035

701 Fifth Avenue, Suite 5400  
Seattle, Washington 98104  
Phone: (206) 622-4900  
Fax: (206) 682-6031

1057556.doc